



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 8
999 18TH STREET - SUITE 300
DENVER, CO 80202-2466
Phone 800-227-8917
<http://www.epa.gov/region08>

SDMS Document ID



2033956

November 24, 2004

Ellison Stollenwerck
La Quinta Inns
909 Hidden Ridge, Suite 600
Irving, TX 75038

RE: Vermiculite Intermountain Site
Salt Lake City, Utah

OPTIONAL FORM 89 (7-90)

FAX TRANSMITTAL		# of pages
To	Ellison Stollenwerck	
From	Floyd Nichols	
Dept./Agency	La Quinta Inns	
Phone #	303.312.6983	
Fax #	303.312.6962	
NSN 7540-01-317-7368	5099-101	
GENERAL SERVICES ADMINISTRATION		

Vince Romney 801.352.2381
801.578.5506

Dear Ms. Stollenwerck:

The purpose of this letter is to provide you with background information and a status update regarding the Vermiculite Intermountain (VI) site, bounded by 100 South, 300 West, 200 South, and 400 West Streets, Salt Lake City (Site). As we have previously discussed, EPA, in April 2004, initiated a Superfund Removal action at the Site, which is heavily contaminated with Libby Amphibole (LA) asbestos. The intent of this ongoing Removal is to remove for offsite disposal, to the maximum extent practical, all visible amounts of identifiable traces of LA from the Site. Physical features of this Site consists primarily of the Artistic Printing Co. (building) on the northwest corner of the parcel, the Frank Edwards building ('FEB') on the northeast corner of the parcel, the Utah Power & Light (UPL) - 3rd West Electrical Substation on the southwest corner of the parcel, and the Ampco parking lot covering the balance of the parcel.

Between mid-April and mid-September of 2004, EPA spent over 18,000 labor hours to clean the interior of the Artistic Printing Co. facility and the Frank Edwards Building. Subsequent to that EPA effort, PacifiCorp, parent company of UPL, pursuant to an EPA-PacifiCorp Administrative Order on Consent (AOC), initiated cleanup of the 3rd West Substation. EPA has overseen and monitored this PacifiCorp-funded phase of the cleanup since it began. This particular phase of the Removal is now nearing completion, with completion anticipated by the end of December.

PacifiCorp's cleanup began with LA abatement inside the switch house, a small, 2-story structure in the center of the substation parcel. After achieving LA clearance standards inside the switch house work spaces, PacifiCorp began excavating adjacent substation areas. PacifiCorp is essentially excavating and removing all visible LA and LA-contaminated materials encountered during excavation, continuing the excavation in any particular spot until 'clean' areas are



encountered at the sides and bottom of the resultant 'pit'. Once 'clean' areas are encountered, the bottom and side-walls of the excavation are sampled by EPA so as to determine, analytically, the efficacy of the LA removal effort. Once the excavated area has been cleared by EPA, it is scheduled for backfilling and restoration by PacifiCorp.

Before excavations began inside the substation fence, both EPA and PacifiCorp estimated the amount of material needing to be dug up and hauled off from this 1.3± acre Site to be approximately 3,900 cubic yards of LA-contaminated soils and debris. To date, approximately 13,000 cubic yards of material have been removed for disposal, and excavations are continuing. The volume of LA remaining at the site in early 2004 was underestimated because we had no clear understanding as to how, and to what extent, demolition of the Vermiculite Intermountain facilities had been accomplished in the late 1980s.

PacifiCorp has now removed at least two feet of contaminated material from most of the substation, an additional 2-4 feet of material in certain areas of the substation, and materials to a depth of 14-16 feet in certain other areas. PacifiCorp has encountered subsurface lenses and discontinuous pockets of Vermiculite ore, exfoliated product, un-exfoliated asbestos fines and bundles, what appears to be furnace, flue, and/or stack clinkers, and other miscellaneous LA-contaminated materials. Also, the excavation grew so as to include the old rail bed (remains of the spur line which serviced, at one time, the VI facility) transiting through the substation, beginning at a depth of approximately two feet below ground surface (bgs) and extending downward to approximately five feet bgs.

As excavations continued in the eastern part of the substation, the pit boundaries approached the UPL fence separating the substation and the Ampco parking lot. By late last week, excavation west of the fence line had progressed to the point where it became apparent that an unknown amount of visible LA extended from the substation, under the fence, and beneath the parking lot. Again, PacifiCorp continues excavating along the west side of the fence, hoping to complete the digging in this area by late in the week of November 29. Accordingly, we will be able to add to our understanding of subsurface conditions at the fence line in early December.

Following are descriptions of the three locations along the fence where visible LA has recently been identified. These three areas are depicted on the enclosed sketch of the substation parcel (Please also refer to the substation drawing I sent to you via fax earlier today.):

Location 1, at the southeast corner of the substation. A small concrete wall, running e-w, located approximately 8 feet bgs, appears to be part of an old VI loading dock. Excavations showed a 'seam' of LA running east along the base of the wall at least as far as the fence line. Old site maps indicate the structure may have extended at least 30 feet beyond the fence line.

Location 2, near the northeast corner of the substation parcel, where the n-s trending and e-w trending fence intersect. This LA-contaminated seam, visible at a depth of

approximately 15 inches bgs, underlies the fence intersection. The seam apparently extends for a short distance onto the parking lot.

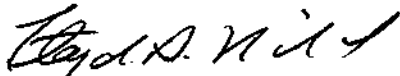
Location 3, along the old track rail bed, past the fence line, onto the parking lot. As we have found, substantial quantities of 'enriched' LA residues have been excavated from along the old rail bed, across the substation parcel. Old maps and photographs of the Site show the original rail bed extending through the Site, from 400 West Street to 300 West Street. The rail bed, at the fence line, lies at an approximate depth of 5 feet bgs, extending downward from there for another 3 feet. On the substation side of the fence, LA residues extend laterally from the rail line to varying distances. Our experience suggests that substantial LA residues will likely be present at the fence line in subsurface horizon(s) when PacifiCorp excavations conclude the end of next week.

On Monday, November 22, I briefed Rick Davidson, one of La Quinta's Salt Lake City representatives, and Jeff Phillips, a representative of Richard Gordon, Westgate Business Center. Participating in the briefing were representatives of PacifiCorp and the Utah Department of Environmental Quality. During our discussion, we reviewed the previous Site activities, status of the current substation cleanup, our current assumptions as to LA contamination remaining under the fence and extending beneath the Ampco parking lot when PacifiCorp terminates its excavations at the end of next week, and my concept of continuing Site cleanup activities beyond next week.

After you have had an opportunity to review and consider this letter, the enclosed sketch and the drawing I faxed to you earlier today, I would like an opportunity to discuss this matter and future plans for cleanup of the Site with you. I can be reached at (303) 312-6983. In addition, EPA Enforcement Attorney Suzanne Bohan, will be EPA's legal contact for the Site for the next several months, while Matt Cohn is away from the office. Suzanne can be reached at (303) 312-6925.

I look forward to hearing from you.

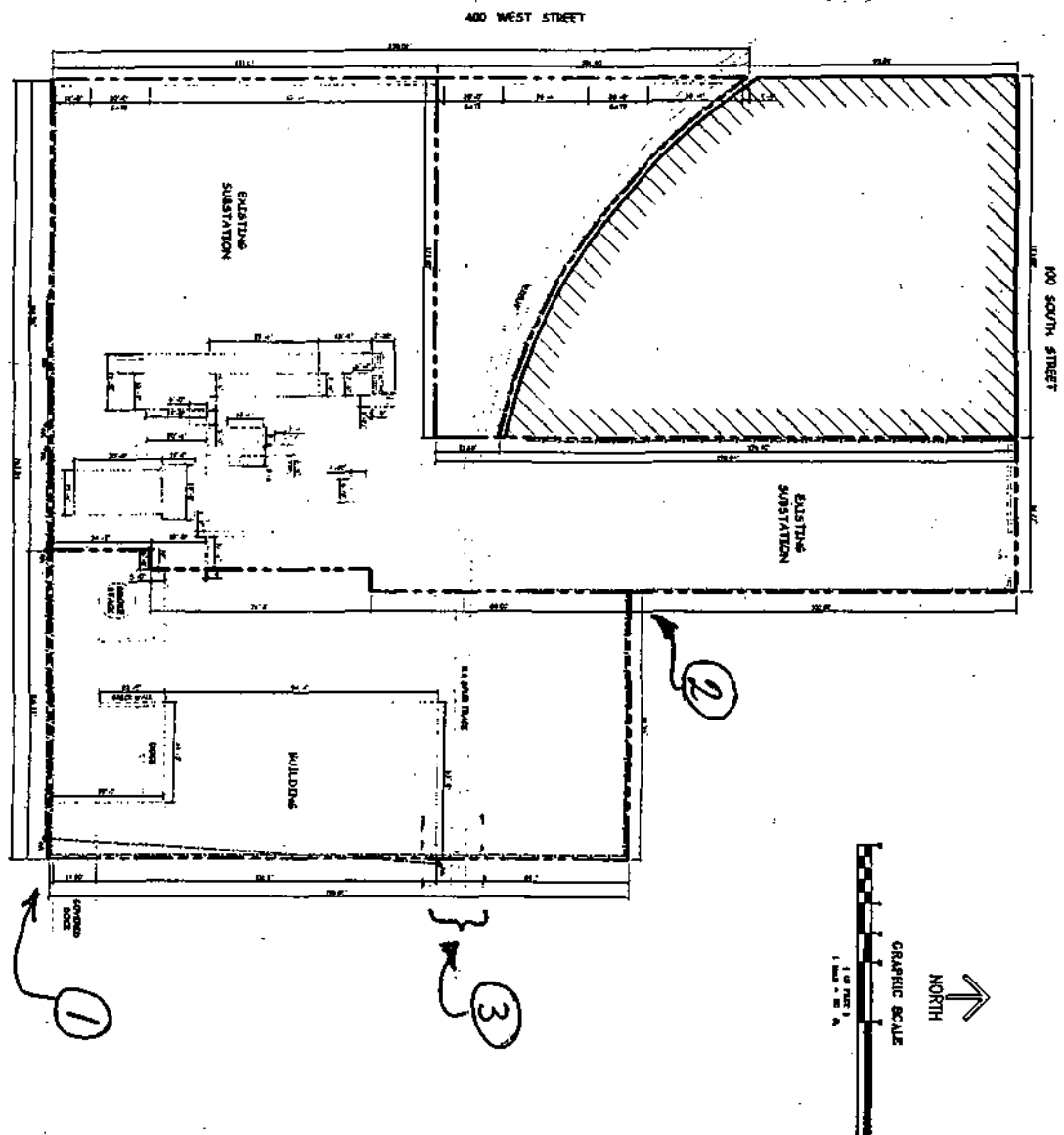
Sincerely,



Floyd D. Nichols

On Scene Coordinator, EPA/8

cc: Suzanne Bohan, 8ENF-L
Craig Barnitz, UDEQ (via fax)



* * * Transmission Result Report (MemoryTX) (Nov. 24. 2004 2:43PM) * * *

1)
2)

Date/Time: Nov. 24. 2004 2:42PM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
2690 Memory TX	82144926453	P. 4	OK	

Reason for error

E. 1) Hang up or line fail
E. 3) No answerE. 2) Busy
E. 4) No facsimile connection

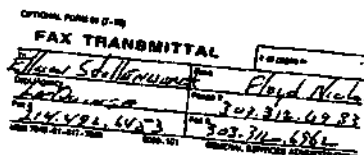
UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

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November 24, 2004

Elison Stollenwerk
La Quinta Inn
909 Hidden Ridge, Suite 600
Irving, TX 75038

RE: Vermiculite Intermountain Site
Salt Lake City, Utah



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* * * Transmission Result Report (MemoryTX) (Nov. 29. 2004 10:20AM) * * *

1)
2)

Date/Time: Nov. 29. 2004 10:18AM

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2696	Memory TX	88013522381	P. 5	OK	

Reason for error

E. 1) Hang up or line fail
E. 3) No answer

E. 2) Busy
E. 4) No facsimile connection



UNITED STATES EI

USEPA, 1000 Pennsylvania Ave. N.W.
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Vince Ramsey
801 352 2381
No. 578 5500

OPTIONAL FORM NO. 10-101

FAX TRANSMITTAL

From: Ellison Stollenwerk To: Frank Edwards

Subject: 201.312.6983

Date: 11/24/04 Time: 3:03 PM

Page: 1 of 1

GENERAL SERVICE ADMINISTRATION

* * * Transmission Result Report (MemoryTX) (Nov. 29. 2004 10:22AM) * * *

1)
2)

Date/Time: Nov. 29. 2004 10:21AM

File No. Mode	Destination	Pg(s)	Result	Page Not Sent
2697 Memory TX	88015785500	P. 4	OK	

Reason for error

E. 1) Hang up or line fail
E. 3) No answerE. 2) Busy
E. 4) No facsimile connection

UNITED STATES OF AMERICA

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http://www.epa.gov/region8

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Vince Ramsey
801 352 2381
801 578 8800

OFFICIAL FORM NO. 10-20

FAX TRANSMITTAL

From: Hilson Stollenwerck
To: Vince Ramsey
Date: 11/24/04
Time: 3:02 PM
Fax: 801-352-2381
Fax: 801-578-8800

CLASSIC, IMPROVED RELIABILITY